



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, CA 94105-3901

August 27, 1998

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John Rieger, Chief
Environmental Stewardship Branch
California Department of Transportation
District 11
P.O. Box 85406
San Diego, CA 92186

Dear Mr. Rieger:

The Environmental Protection Agency has reviewed the information concerning the proposed State Route 905 extension from Interstate 805 to the Otay Mesa Point of Entry. Based upon the statement of potential impacts on wetlands in your letter, our involvement in the concurrent process is appropriate in accordance with the NEPA/404 Memorandum of Understanding (MOU). Therefore, as you requested in your letter and per the MOU, we will be offering comments on basic project purpose and need, criteria for alternative selection and the range of alternatives to be evaluated in the DEIS.

We are pleased to offer our initial concurrence on the basic project purpose and need and the criteria for alternative selection. We concur that the purpose and need for the project is adequately defined to satisfy the NEPA and Section 404 project purpose standards. However, we have a few suggestions to clarify the Need statement. We recommend that Caltrans and FHWA try to link and simplify the issues laid out in this Purpose and Need statement, separating the need issues, such as safety and congestion from the purpose of the project, and presenting them in a manner that is easier for a reader to understand. Also, can you clarify why the accident rate is so significantly higher on this portion of the road, and identify the conditions under which the road operates that cause those accidents?

Based upon the information we have been given at this stage, we can concur that the alternatives presented should be carried forward into the DEIS, however, we have questions about the ultimate size of the project and believe there may be other alternatives that could be examined and included in the range of alternatives. According to the documentation the widened Otay Mesa Road will carry 50,000 Average Daily Traffic (ADT) and there is an expected 110,000 ADT on 905. How do the two roads and their associated ADT interact and does the 110,000 ADT on 905 include the 50,000 ADT on Otay Mesa road or some portion of those trips? We are unclear how these numbers indicated to FHWA and Caltrans that with the associated 6 lane urban arterial, ultimately an 8-lane freeway would be needed in the future. Our understanding is that as a standard, one lane of a freeway/expressway facility can serve 25,000 vehicles per day. If that is the case, then that would indicate to us that 4 freeway lanes and

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possibly 6, can serve the expected amount of traffic. We would also like to examine an alternative that switches the alignments of the two facilities, placing the 905 alignment as a freeway on the Otay Mesa road alignment, and putting Otay Mesa road on the proposed 905 alignment as a 6 lane urban arterial. We look forward to discussing these issues with you further as you move through the environmental analysis process.

Regarding our level of involvement and cooperating agency status, we will continue working with you through the NEPA-404 MOU process, and are available for additional consultation, however, not as an official cooperating agency due to our limited resources. If you have any questions, please call David Carlson of my staff at (415) 744-1577.

Sincerely,

David Farrel, Chief
Federal Activities Office

cc: S.Barrett, USFWS
D. Zoutmedyk, ACOE
J.Lewis, FHWA